# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

This work plan applies to all activities that are carried out in the 2014-2015 Federal Fiscal years (October 1, 2013 thru September 30, 2014 and October 1, 2014 through September 30, 2015), using funds allocated pursuant to §105 of the Federal Clean Air Act (CAA). These funds were allocated to the State of Nebraska via a grant to the Nebraska Department of Environmental Quality (NDEQ), and subsequently passed on to the Lincoln-Lancaster County Health Department (LLCHD) for the activities set forth in this work plan. LLCHD is required to make a 40% match with non-federal funds.

There are 5 major parts to this work plan:

I. Program Commitments
II. Federal and State Grant Requirements
III. Disbursements
IV. Authorization
V. Attachments

**Reports required** under this work plan:

1. Reports submitted as described in Part I.A.1.
2. Annual MBE/WBE report as described in Part I.A.1.
3. Reimbursement Requests as described in Part III.

**NDEQ Contact Information**

Technical Issues: Chris Hetzler (471-0007) chris.hetzler@nebraska.gov or

Jim Yeggy (471-2142) jim.yeggy@nebraska.gov

Budget & Reimbursements: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

Grant Requirements: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

MBE/WBE Submittals: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

All written correspondence, reimbursement requests and MBE/WBE reports should be directed to the appropriate person at the address below:

Nebraska Department of Environmental Quality
1200 'N' Street, The Atrium, Suite 400
PO Box 98922
Lincoln, NE 68509-8922

## PART I. Lincoln/Lancaster County Health Department (LLCHD) §105 Program Commitments

### A. Reports

1. LLCHD shall submit all reports to Tracy Zimmerman (tracy.zimmerman@nebraska.gov), except for reports identified in J.1 and J.2 below which should be submitted to Jim Yeggy (jim.yeggy@nebraska.gov). The required format for submitting the annual report is provided in Attachment B. The reports must be provided via email per the following timelines:

| Report | Time Table |
|---|---|
| Annual (Attachment B for the period of October 1, 2013-September 30, 2014) | Due October 15, 2014 |
| MBE/WBE Report (http://www.epa.gov/osbp/pdfs/5700_52a.pdf ) | Due October 15, 2014 |
| Annual (Attachment B for the period of October 1, 2014-September 30, 2015) | Due October 15, 2015 |
| MBE/WBE Report (http://www.epa.gov/osbp/pdfs/5700_52a.pdf ) | Due October 15, 2015 |

### B. Planning and SIP Management Activities: LLCHD Program Regulations and Standards Modifications

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall, as necessary, propose revisions to the '*Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards*' (LLCAPCPRS) to address environmental priorities and to incorporate Federal Regulations promulgated pursuant to the 1990 CAA Amendments. | As necessary. |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

| LLCHD Commitments | Time Table |
|---|---|
| 2. LLCHD shall utilize all applicable local regulations and departmental policies concerning public processes associated with regulation development and proposals. LLCHD shall supply the following as applicable:<br>a. Submit a copy of the public notice process utilized by LLCHD for regulation changes and permitting to the NDEQ.<br>b. Provide a copy of all meeting notices related to regulation or policy change to the NDEQ.<br>c. If LLCHD is intending to provide testimony on Title 129 or SIP modifications, draft copies or summary information concerning the planned testimony must be provided to the NDEQ at least one week prior to the EQC hearing, legislative hearing, etc. This commitment does not preclude the LLCHD from amending planned testimony. If amendments are made to the planned testimony, LLCHD will immediately notify the NDEQ of the amendments. | a. By December 31, 2014. Future revisions to the process must be submitted within 30 days of revision.<br>b. At the time of public issuance.<br>c. As applicable. |
| 3. New regulatory requirements that have been incorporated into Title 129 must be promulgated into the LLCAPCPRS. Proposed LLCAPCPRS revisions that are awaiting administrative approvals are acceptable with written notification to NDEQ. | Within 12 months of incorporation into Title 129. |
| 4. LLCHD shall identify sources impacted by regulatory changes and disseminate information as appropriate in regard to promulgation of new regulations. | As applicable. |

| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ shall notify LLCHD and request input during the initial stages of the development of proposed revisions to Title 129. | As applicable. |
| 2. NDEQ shall provide formal notification to LLCHD when draft revisions to Title 129 are available, provide a copy of all proposed revisions to LLCHD indicating the proposed changes, and shall request comment. | Upon development of the draft proposals. |
| 3. NDEQ shall directly notify LLCHD by e-mail or other appropriate means when proposed changes to Title 129 have been finalized. | Within 30 days of approval by the Governor. |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

## C. Planning and SIP Management Activities: State Implementation Plan (SIP) Modifications

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD must evaluate all proposed LLCAPCPRS rule/regulation changes to ensure that they are consistent with the Nebraska SIP. | Prior to placing the proposed rule/regulation changes on public notice. |
| 2. All necessary documentation of rule/regulation changes to be incorporated into the Nebraska SIP must be provided to the NDEQ. | No later than 30 days after adoption. |
| 3. LLCHD will review and, when appropriate, prepare comments on proposed State and Federal Regulations and policies that may impact the LLCHD Air Quality Program. | As applicable. |

| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ shall submit all revised LLCAPCPRS regulations to the EPA for inclusion in the Nebraska SIP. | Within 6 months of receipt of the final approved revisions from LLCHD. |

## D. Emission Inventory

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD will develop and submit to EPA an emission inventory, including all necessary data elements, as prescribed by the Air Emission Reporting Rule (AERR). | By December 31 of each year. |
| 2. The LLCHD will continue to compile a toxic emissions inventory for point sources. HAP inventories must be consolidated with Criteria inventories and submitted to the EPA as outlined in AERR. | As applicable. |
| 3. If EPA generated toxic inventory estimates for mobile, biogenic and area sources are utilized, LLCHD will review the estimates for relative accuracy. | As applicable. |
| 4. The LLCHD will annually conduct emission inventory audits at a minimum of 10% of Class II sources. | By December 31 of each year. |
| 5. If errors occur during the submission of data to the National Emissions Inventory Database, LLCHD will make corrections to their data submittal and resubmit changes by the deadlines established in the AERR. | By necessary timeframes provided by the EPA or NDEQ. |
| 6. The LLCHD will follow the procedures specified in their Quality Assurance Project Plan (QAPP) to identify and correct suspect data. | As applicable. |

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| LLCHD Commitments | Time Table |
|---|---|
| 7. The LLCHD shall submit a copy of their approved QAPP for its Emission Inventory activities to Tracy Zimmerman. | By December 31 of each year. |
| 8. The LLCHD will annually supply NDEQ with an electronic copy of all emission inventories gathered for the previous year or provide NDEQ access to the LLCHD emission inventory database. | The previous year's emission inventory data will be supplied by May 1 of each year. |

**E. Hazardous Air Pollutant Program**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD will send to NDEQ copies of any final 112(g) determinations. | Within 60 days of permit issuance. |
| 2. LLCHD will send to NDEQ copies of Initial Notification and Compliance Certification for MACT sources it receives. If it is unclear whether the Initial Notification or Compliance Certification was sent to the EPA, LLCHD will forward a copy to EPA Region 7. | Within 30 days of receipt. |
| 3. LLCHD will provide NDEQ, as part of the annual report, a compilation of all sources identified as subject to NESHAPs as well as negative declarations. | By October 15 of each year. |

| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ will send to LLCHD copies of Initial Notification and Compliance Certification received from MACT sources in Lancaster County. | Within 30 days of receipt. |

**F. Compliance and Enforcement Activities**

| LLCHD Commitments | Time Table |
|---|---|
| 1. For inspections at Air Emission Sources (except the Asbestos NESHAPs Program):<br>a. LLCHD will implement EPA's Compliance Monitoring Strategy dated April 2001.<br>b. LLCHD will follow the Policy on Timely & Appropriate Enforcement to High Priority Violations (T&A, dated 12/22/98). | |

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| LLCHD Commitments | Time Table |
|---|---|
| 2. LLCHD will continue to respond to asbestos-related complaints and inquiries as well as alleged asbestos-related violations. LLCHD will maintain records of asbestos-related complaints received, resolution of complaints, and asbestos inspections conducted. | |
| 3. Compliance Reports: LLCHD will review all reports submitted by non-Title V sources in fulfillment of permit requirements to determine compliance with the applicable requirements. | Within the calendar year that they are received. |
| 4. Enforcement:<br>a. LLCHD will issue Notices of Violation promptly upon discovery of violations. The notice of violation will contain an order to correct the deficiency. Sources will be required to return to compliance within 60 days of receipt of the letter unless circumstances require a longer compliance schedule to be approved by LLCHD.<br>b. In general, NDEQ and LLCHD will assume the enforcement lead for violations identified by their respective programs. However, there may be instances where it would be more appropriate for either NDEQ or LLCHD to take the lead for a violation cited by the other agency. These cases will be discussed to determine any impediments to enforcement, and which agency is best suited to address the violations.<br>c. Violations that are identified as High Priority Violations will be addressed by LLCHD by following the Policy on Timely and Appropriate Enforcement to High Priority Violations (T&A) dated December 22, 1998 and in accordance with the current Performance Partnership Agreement.<br>d. LLCHD will promote Pollution Prevention and Supplemental Environmental Projects in Enforcement Settlements when appropriate.<br>e. When requested by the NDEQ, LLCHD will share compliance related information in order to support enforcement cases being pursued by the NDEQ. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

| LLCHD Commitments | Time Table |
|---|---|
| f. LLCHD shall observe a minimum of 2 stack tests and/or Relative Accuracy Testing Audits (RATAs) annually.<br>g. LLCHD shall perform a minimum of 4 reviews of stack test and/or RATA results. | |
| 5. Open Burning: LLCHD will review open burning requests for potential sites located in Lancaster County. Burning permits will be issued or denied in accordance with approved LLCHD regulations. | |
| 6. Acid Rain:<br>a. LLCHD will work with NDEQ to implement acid rain activities and report information to NDEQ.<br>b. LLCHD will review all acid rain permits in Lancaster County and permit modifications. | |
| 7. LLCHD staff will provide data which results in a source's re-classification to the data manager as soon as practicable. | |
| 8. LLCHD will notify NDEQ of penalty amounts as a result from enforcement actions within 30 days to the date the fine is levied. | |
| 9. LLCHD inspection reports will document the status of all applicable requirements, including any NESHAP requirements. | |
| 10. LLCHD will include all enforcement documentation, including penalty calculations, in the source file and according to LLCHD's confidentiality procedures. | |
| 11. LLCHD will include all inspection cover letters and a signed copy of the report in each source file. | |
| 12. LLCHD will review each excess emission and coal analysis report received. LLCHD will notify NDEQ within 30 days if any report exceeds 5% excess emissions or 5% monitor downtime based on the emission unit's operational time. | |
| 13. On-Site and Phone Technical and Compliance Assistance: LLCHD Air Program staff will provide compliance and technical assistance on air quality regulations to non-Title V sources as requested. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ will provide LLCHD with at least a 14 day advance notice of any Lancaster County air source inspection activity to be conducted by NDEQ for the purpose of monitoring compliance with regulations which LLCHD has adopted. The LLCHD will be provided an opportunity to participate in these inspections. The EPA or NDEQ may participate in LLCHD led inspections. | |
| 2. When NDEQ is notified that EPA is conducting compliance activity in Lancaster County that is not related to compliance with local regulations (e.g. CFC and mobile source inspections), NDEQ will provide the LLCHD with advance notice of said activities to the extent possible. | |
| 3. NDEQ shall send to LLCHD copies of all reports received related to EPA inspections conducted in Lancaster County if it is apparent that the reports were not received by LLCHD. If business confidentiality is claimed by the source, the inspection report may not be fully available for review. | Upon receipt by the NDEQ. |

**G. Construction Permit Activities**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall review permit applications for new and modified non-PSD sources of air pollutants and issue permits in accordance with the approved Nebraska SIP. Permit conditions and limitations shall be written in a federally enforceable manner. All public notices will be provided to the NDEQ at the time of issuance. Copies of applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request. | |
| 2. LLCHD will submit to NDEQ construction permit information concerning a project description, the type of permit (e.g. PSD, Part D, synthetic minor, as built, NSPS & NESHAPs), and the permit reviewer upon request. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

| LLCHD Commitments | Time Table |
|---|---|
| 3. LLCHD will provide a response to any NDEQ and/or EPA comments on proposed permits received during the 30-day public comment period. | |
| 4. To facilitate permit review, the LLCHD will make all facility files available at their respective offices for EPA/NDEQ review. | |
| 5. LLCHD will notify NDEQ prior to issuing a variance or waiver from air pollution rules or regulations. | Prior to issuance of the variance or waiver. |
| 6. LLCHD will send a copy of PSD permit applications and supplemental information to NDEQ and EPA. | Within two weeks after receipt of such information. |
| 7. LLCHD will send a copy of each PSD public notice package to NDEQ and EPA. The package will include a copy of the draft permit, a fact sheet, and the public notice. | By the start of the public comment period. |
| 8. LLCHD will send a copy of each final PSD permit package to NDEQ and EPA. The final package will include a copy of the final permit decision, response summaries, and any other supporting materials. | Within two weeks of finalization of the permit package. |
| 9. LLCHD shall submit Best Available Control Technology/Lowest Achievable Emission Rate (BACT/LAER) decisions to EPA's national clearinghouse. | Within 30 days of permit issuance. |
| 10. LLCHD will review and comment on submitted dispersion modeling in accordance with the Nebraska SIP and other state and EPA regulations. | Within 30 days of receipt. |
| 11. For draft PSD permits reviewed by NDEQ and/or EPA and for which confidential information has been received by the LLCHD, the LLCHD will notify the source of its obligation to provide copies of such information to the NDEQ and/or EPA in order for the NDEQ and/or EPA to complete its review. | |
| 12. Where appropriate and as resources allow, LLCHD will conduct a screening analysis for toxics when issuing construction permits and make that information available to the public. | |
| 13. LLCHD will ensure that a statement of basis is always prepared for all construction permits. LLCHD will fully explain the provisions of each permit and reasons for omitting any other provisions that might appear to be applicable to the source or process. | |

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| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ will notify the LLCHD of any concerns with proposed permits within the 30-day public notice period. | |

**H. Operating Permits**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall review permit applications and develop and issue non-Title V Class II operating permits. Permit conditions and limitations shall be written in a federally enforceable manner. Copies of public notices, applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request. | As needed. |
| 2. To facilitate permit review, the LLCHD will make files available at their office for NDEQ/EPA review. | As needed. |
| 3. LLCHD will issue warning letters or will take enforcement action when sources do not comply with Part 70 application requirements regarding renewal applications being submitted less than six months prior to the expiration of the permit. | |
| 4. LLCHD will ensure that all pre-construction permit changes will be public noticed and any conditions noted in an operating permit will be consistent with those in the applicable construction permit(s). | |
| 5. LLCHD will ensure that a statement of basis is always prepared for all operating permits. LLCHD will fully explain the provisions of each permit and reasons for omitting any other provisions that might appear to be applicable to the source or process. | |
| 6. All applicable requirements outlined in the permit will be accompanied by the citation of the appropriate, underlying Federal, State, or Local regulatory authority. | |

**I. Ambient Monitoring: Network Operations**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall operate the ambient network described in *Attachment A: LLCHD §105 Air Monitoring Network Summary Description*. Changes to the network may be made due to shifting monitoring | |

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| LLCHD Commitments | Time Table |
|---|---|
| priorities and/or monetary constraints. Prior NDEQ approval is required for such changes. Unplanned site losses may also result in network modifications. See subsections below for more information relative to network modification requirements. | |
| 2. The ambient network shall be operated so as to comply with the requirements set forth in 40 CFR Part 58. | |
| 3. The ambient network shall be operated in accordance with applicable Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures (SOPs) (Also see Subsection L below). | |
| 4. The ambient network shall be operated so as to achieve at least 75% complete data from each monitor in each calendar quarter. | |
| 5. LLCHD shall provide prior written requests to NDEQ for network changes that include basis documentation, and/or requests for technical support to provide basis documentation. | |
| 6. In the event of unplanned loss of a site (e.g., storm damage, building eviction), oral notice shall be promptly provided to the NDEQ, with a follow-up written notice (mail or email). The written notice shall include a plan for re-locating or discontinuing the site, including basis documentation and/or a technical support request. | Within 30 days of the unplanned loss of the site. |
| 7. LLCHD will review sites to ensure they comply with the siting criteria set forth in 40 CFR Part 58, Appendix E (8) using the site review checklist provided by the NDEQ. Retain checklist as documentation of site reviews for at least 3 years. | |

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## J. Annual Network Reviews

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall complete a review of the ambient network to ensure that it meets the monitoring objectives defined in 40 CFR Part 58, Appendix D and to examine network effectiveness. Network reviews will consider the following:<br>a. Modifications needed to implement changing Federal and State priorities, such as those associated with the Regional Air Monitoring Strategy and Phase I of Ncore Level II;<br>b. Data reviews with respect to NAAQS compliance and inter-site correlations; and<br>c. Any new or revised modeling results that may be available. | Annually by May 1. |
| 2. LLCHD shall submit a written network review report. This report shall include:<br>a. A description of any network changes in the previous and current calendar year;<br>b. Any network change recommendations for the remainder of the calendar year and their basis; and<br>c. Any technical review and/or support needs (e.g., modeling assistance) anticipated for the next year. | Annually by May 15. |
| 3. LLCHD shall relocate the Lincoln MSA ozone monitor in FFY2015. Alternatively LLCHD may operate SPM or temporary investigative monitoring sites as part of the new site selection process. | By December 31, 2015. |

## K. Ambient Monitoring AQS Data Submittal

| LLCHD Commitments | Time Table |
|---|---|
| 1. Data Submittal: LLCHD shall submit all ambient air quality data to AQS. The data submitted shall include raw data as well as accuracy, precision, and bias data. The data shall be coded into the AIRS-AQS format and submitted via electronic transmission. Data submitted to AQS shall be edited and validated prior to submission. Operational data shall be reported in accordance with 40 CFR Part 50, Appendix L. | Within 90 days of the close of the following calendar quarters:<br>• January 1 - March 31<br>• April 1 - June 30<br>• July 1 - September 30; and<br>• October 1 - December 31 |

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| LLCHD Commitments | Time Table |
|---|---|
| 2. Data Review: LLCHD shall retrieve AQS data using the AMP 450 report format to verify that data submittal is complete, and to review NAAQS compliance. | Following the quarterly submittal of monitoring data. |

**L. Ambient Monitoring: Quality Assurance**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall maintain and follow Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures (SOPs) that comply with the Federal requirements set forth 40 CFR Part 58 and EPA QA/R-5 (*EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations*). LLCHD shall either follow QAPP and SOP procedures developed by the NDEQ, or develop and follow their own QAPPs and/or SOPs. | |
| 2. NDEQ and LLCHD will coordinate in the review and possible updates of QAPPS and SOPs pertinent to this work plan. | |
| 3. If LLCHD utilizes its own QAPP and /or SOPs, the following requirements apply:<br>a. QAPP and SOPs must comply with all EPA requirements (i.e., 40 CFR Part 58 and EPA QA/R-5);<br>b. LLCHD SOP developed under the NDEQ QAPP must be consistent with NDEQ's QAPP;<br>c. QAPP and SOPs, and modifications must be submitted to NDEQ for review and approval;<br>d. LLCHD shall address any NDEQ comments or change requests that apply to QAPPS and SOPs; and<br>e. QAPPs must be reviewed annually in accordance with the requirements set forth in EPA QA/R-5. | |
| 4. The standards used in the checks and audits must be certified and their certifications kept current. | |

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## M. Audit Participation

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD shall participate in audits conducted by EPA, NDEQ, or contractors representing these agencies. | As requested. |
| 2. LLCHD shall address and correct any deficiencies recognized in said audits. In the event an audit finds deficiencies or requests corrective actions, LLCHD shall submit a response to NDEQ and/or EPA as appropriate. Said response shall describe corrective actions to be taken and a timetable for completing them. | Within 45 days of receipt of the final audit report. |

| NDEQ Commitments | Time Table |
|---|---|
| 1. For audits of LLCHD conducted by the NDEQ, the final audit report shall be submitted to LLCHD. | Within 60 days of completion of the audit. |

## N. Ambient Monitoring: Equipment Purchases

| LLCHD Commitments | Time Table |
|---|---|
| 1. When requested by NDEQ, provide a list of equipment needed for purchase. A one-year planning period is typically requested, and information needs include: equipment description, approximate cost and funding source(s). | By January 1 each year. |
| 2. Maintain a list of all equipment purchases made in the current Federal fiscal year and supply the list with the work plan annual report. The list must include the following information: equipment description, month of purchase, cost, and funding sources. | |

## O. Inter-Agency Communications

| LLCHD Commitments | Time Table |
|---|---|
| 1. Decision-Making / Technical Support: Any request for decision-making or technical support shall be made in writing, with support documentation provided as needed or requested. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

| LLCHD Commitments | Time Table |
|---|---|
| 2. LLCHD agrees to consult with NDEQ on consistency/uniformity/communication matters relating to construction/Non-Title V operating permits and violations before consulting with the EPA. | |
| 3. LLCHD will participate in state/EPA teleconferences or meetings regarding the air quality program. | As requested or appropriate. |
| 4. EPA - LLCHD Interactions: LLCHD shall:<br>a. Inform NDEQ of any meetings with EPA; and<br>b. Provide NDEQ with copies of EPA correspondence that is not addressed to and/or not received by NDEQ. | |
| 5. Information Requests: LLCHD shall provide information relative to activities carried-out using §105 grant funding. | As requested by the NDEQ. |
| 6. On-Site and Phone Technical and Compliance Assistance: LLCHD will provide compliance and technical assistance on air quality regulations to non-Title V sources. | |

| NDEQ Commitments | Time Table |
|---|---|
| 1. NDEQ commits to providing LLCHD timely information on issues that come to its attention which relate to air quality work, e.g. correspondence, notifications, guidance, etc. which may be addressed only to State agencies from EPA. | |

**P. Electronic Communications**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD will provide compliance summary information as notices are issued to sources. LLCHD will provide notification about PSD permits as issued. Permitting summary information will be provided to the NDEQ relative to stationary sources annually. | Compliance notices and PSD permits as issued. Permitting summary information with the annual report. |
| 2. Stationary source activities will be entered into AIRS Facility Subsystem (AFS). The information will include the minimum mandatory data elements required nationwide. | Information will be entered by the 8th of each month. |

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| LLCHD Commitments | Time Table |
|---|---|
| 3. LLCHD agrees to cooperate with the NDEQ and EPA to address any data transfer problems that may be recognized. | As applicable. |
| 4. Data that is electronically transmitted by LLCHD will only be changed by LLCHD, from the original submittal, unless otherwise agreed to by LLCHD. | |
| 5. LLCHD commits to working with the NDEQ to facilitate electronic access to LLCHD data as needed. | |

**Q. Training**

| LLCHD Commitments | Time Table |
|---|---|
| 1. All personnel responsible for data collection/reviews shall complete training consistent with their responsibilities (for Ambient Monitoring QA requirements see L.1). As resources allow, LLCHD will encourage additional training and education for its employees in the program as needed and appropriate. | |
| 2. As resources allow, the LLCHD will participate in EPA data management work groups, and national and regional AIRS conferences charged with identifying the system enhancements necessary to improve data management. | |
| 3. LLCHD shall maintain a training list for all staff members for the most recent 1 year period. The training list must include: Name/Description of Training, Number of Attendees, Date(s), Location, and funding source(s). | |

**R. Public Education and Outreach**

| LLCHD Commitments | Time Table |
|---|---|
| 1. LLCHD will continue to educate the public regarding air quality data and issues under Lincoln Lancaster County Health Department Air Quality's jurisdiction. LLCHD will track training provided to employees that is funded with §105 grant funds and report such training annually. | Training shall be reported by October 15 of each year. |

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| LLCHD Commitments | Time Table |
|---|---|
| 2. LLCHD will participate in educational events sponsored by EPA when appropriate and when resources allow. | |
| 3. LLCHD will encourage industry to seek voluntary reductions in air toxics when the opportunities occur. | |

## PART II. Grant Requirements

See Attachment A for a listing of the grant agreement conditions that shall be complied with by LLCHD.

## PART III. Disbursements

NDEQ will provide pass through money to LLCHD to carry out the activities addressed in this workplan within Lincoln/Lancaster County. LLCHD will be responsible for providing a minimum 40% match to the federal funding it receives. The NDEQ will inform LLCHD of federal funding available at such time the EPA informs NDEQ of its allocations each year.

The funds available for disbursement for this work plan are specified in the following table:

**FFY 2014 Section 105 LLCHD Grant Budget**

| Budget Category | Section 105 Funds | Local Matching Funds |
|---|---|---|
| Personnel | $47,635.00 | $37,231.00 |
| Benefits | $19,280.00 | $15,205.00 |
| Contractual (office rent, data processing) | $4,000.00 | $500.00 |
| Supplies | $850.00 | $0 |
| Other (utilities) | $8,810.00 | $1,500.00 |
| Travel | $1,000.00 | $1,420.00 |
| Equipment | $0.00 | $0.00 |
| TOTAL DIRECT | $81,575.00 | $55,856.00 |
| Indirect | $15,425.00 | $10,560.00 |
| TOTAL | **$97,000.00** | **$66,416.00** |

FTE Estimate: 1.75

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

## FFY 2015 Section 105 LLCHD Grant Budget

| Budget Category | Section 105 Funds | Local Matching Funds |
|---|---|---|
| Personnel | $46,920.00 | $37,231.00 |
| Benefits | $19,915.00 | $15,205.00 |
| Contractual (office rent, data processing) | $4,000.00 | $500.00 |
| Supplies | $930.00 | $0.00 |
| Other (utilities) | $8,810.00 | $1,500.00 |
| Travel | $1,000.00 | $1,420.00 |
| Equipment | $0.00 | $0.00 |
| TOTAL DIRECT | $81,575.00 | $55,856.00 |
| Indirect | $15,425.00 | $10,560.00 |
| **TOTAL** | **$97,000.00** | **$64,666.00** |

FTE Estimate: 1.75

The total cost of this Cooperative Agreement shall not exceed $194,000.00 in grant funds for the grant period specified in this workplan. The annual section 105 funding provided by the NDEQ shall not exceed $97,000 in FY 2014. The grant amount in FY 2015 may include funding underspent in year 1 up to a maximum 60% of the total amount of this Cooperative Agreement not to exceed $194,000 for the entire period. LLCHD shall match funds spent annually with an annual minimum match of 40% under this Cooperative Agreement.

**Reimbursement Requests:** LLCHD is responsible for submitting requests to Tracy Zimmerman, NDEQ Air Quality Division. The following must be included with reimbursement requests:

1. Reimbursement will be provided quarterly based upon actual expenses incurred in that timeframe and identified on the invoice.
2. Invoices must include Itemized expenses detailing the work performed and equipment purchased during the grant period funded with 105 grant monies.
3. LLCHD's match must be itemized and submitted with the reimbursement request.

Final reimbursement requests should be submitted no later than 30 days following the end of the grant period.

**NDEQ Review/Payment: :** All requests for reimbursement of costs incurred by the LLCHD shall be reviewed pursuant to the provisions of the Nebraska Prompt Payment Act, Sections 81-2401 to 81-2408.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
# Attachment A: Federal and State Grant Requirements

**The following grant conditions shall be complied with by all subrecipients of federal grant funds.**

## A. Federal Requirements

**1. <u>Requirement for Data Universal Numbering System (DUNS) numbers:</u>**

If you are authorized to make subawards under this award, you:

1. Must notify potential subrecipients that no entity (see definition in paragraph C of this award term) may receive a subaward from you unless the entity has provided its DUNS number to you.

2. May not make a subaward to an entity unless the entity has provided its DUNS number to you.

   **Definitions**. For purposes of this award term:

   Data Universal Numbering System (DUNS) number means the nine-digit number established and assigned by Dun and Bradstreet, Inc. (D&B) to uniquely identify business entities. A DUNS number may be obtained from D&B by telephone (currently 866-705-5711) or the Internet (currently at http://fedgov.dnb.com/webform).

3. Entity, as it is used in this award term, means all of the following, as defined at 2 CFR part 25, subpart C:

   a. A Governmental organization, which is a State, local government, or Indian tribe;
   b. A foreign public entity;
   c. A domestic or foreign nonprofit organization;
   d. A domestic or foreign for-profit organization; and
   e. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.

4. Subrecipient means an entity that:

   a. Receives a subaward from you under this award; and
   b. Is accountable to you for the use of the Federal funds provided by the subaward.

All Subrecipients must complete the Sub-Award Certification form. The Sub-Award Certification form must be completed for each grant period.

**2. <u>Anti-Lobbying:</u>**

Pursuant to EPA's annual Appropriations Act, the chief executive officer of this recipient agency shall require that no grant funds have been used to engage in lobbying of the Federal Government or in litigation against the United States unless authorized under existing law.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program

**PART IV. AUTHORIZATION**

LINCOLN LANCASTER COUNTY HEALTH DEPARTMENT

By:_____

Chris Beutler, Mayor
City of Lincoln

Date:_____

NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY

By: Thomas R Lamberson

Thomas R. Lamberson
Deputy Director of Administration

Date: April 15, 2014

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment A: Federal and State Grant Requirements

Recipient agrees to comply with the respective OMB Circular (A-21, A-87, or A-122), which prohibits the use of federal grant funds for litigation against the United States. Recipients subject to the requirements of 40 CFR Part 30 agree to comply with the respective OMB Circular (A-21 or A-122), which prohibits the use of Federal grant funds to participate in various forms of lobbying or other political activities.

Recipient agrees to comply with the Anti-Lobbying Act, Section 319 of Public Law 101-121, effective December 23, 1989.

Recipient acknowledges that if any expenditure is made as prohibited by the Act, that he shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such expenditure.

Recipient further acknowledges that failure to file or amend the disclosure form, if required, shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Recipient also agrees to include in all solicitation documents the following:

"Sub recipients who request or receive from the grant recipient a subgrant, contract, or subcontract exceeding $100,000, at any tier under a federal grant shall comply with the Anti-Lobbying Act, Section 319 of Public Law 101-121, and file an Anti-Lobbying Certification form, and the Disclosure of Lobbying Activities form, if required, to the next tier above."

3. **Debarment and Suspension:**
Recipient agrees to fully comply with Subpart C of 2 CFR Part 180 and 2 CFR Part 1532, entitled Responsibilities of Participants Regarding Transactions. Recipient must ensure that any lower tier covered transaction, as described in Subpart B of 2 CFR Part 180 and 2 CFR Part 1532, entitled Covered Transactions, includes a term or condition requiring compliance with Subpart C. Recipient agrees to include a similar term or condition in any subsequent lower tier covered transactions. Recipient agrees that failing to disclose the required information in 2 CFR 180.335 may result in the delay or negation of this assistance agreement, or pursuance of legal remedies, including suspension and debarment. Recipient may access the Excluded Parties List System at www.sam.gov.

4. **Hotel and Motel Fire Safety Act of 1990:**
Recipient agrees to ensure that all space for conferences, meetings, conventions or training funded in whole or in part with Federal funds comply with the Hotel and Motel Fire Safety Act of 1990.

5. **Single Audit:**
The Recipient agrees if $500,000 or more in total Federal funds is expended in any fiscal year, they will obtain a single audit from an independent auditor according to the guidance provided in OMB Circular A-133. The Recipient agrees that within nine months after the fiscal year end or 30 days after receiving the report from the auditor, they will electronically submit a copy of the data collection form SF-SAC and a Single Audit Report Package to the Federal Audit Clearinghouse Internet Data Entry System.

For complete instructions for electronic submission of the SF-SAC and the Single Audit Report Package are located at the Federal Audit Clearinghouse Web site: http://harvester.census.gov/fac/.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
# Attachment A: Federal and State Grant Requirements

6. **Trafficking Victim Protection Act of 2000:**
To implement requirements of Section 106 of the Trafficking Victims Protection Act of 2000, as amended, the following provisions apply to this award:

   a. We, as the Federal awarding agency may unilaterally terminate this award, without penalty, if a sub-recipient that is a private entity: (1) is determined to have violated an applicable prohibition in the Prohibition Statement below; or (2) has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in the Prohibition Statement below through conduct that is either: (a) associated with performance under this award; or (b) imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, "OMB Guidelines to Agencies on Government wide Debarment and Suspension (Non-procurement)," as implemented by our agency at 2 CFR part 1532. You must inform us immediately of any information you receive from any source alleging a violation of a prohibition in the Prohibition Statement below.

   b. Our right to terminate unilaterally that is described in paragraph a of this award term: (1) implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and (2) is in addition to all other remedies for noncompliance that are available to us under this award.

   c. You must include the requirements of the Prohibition Statement below in any subaward you make to a private entity.

   **Prohibition Statement** - You as the recipient, your employees, sub-recipients under this award, and sub-recipients' employees may not engage in severe forms of trafficking in persons during the period of time that the award is in effect; procure a commercial sex act during the period of time that the award is in effect; or use forced labor in the performance of the award or sub-awards under the award.

7. **Civil Rights Obligations:**
This term and condition incorporates by reference the signed assurance provided by the recipient's authorized representative on: 1) EPA Form 4700-4, "Preaward Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance"; and 2) Standard Form 424B or Standard Form 424D, as applicable. These assurances and this term and condition obligate the recipient to comply fully with applicable civil rights statutes and implementing EPA regulations.

8. **Recycling:**
The Recipient agrees, in accordance with EPA Order 1000.25 and Executive Order 13423, Strengthening Federal Environmental, Energy and Transportation Management (January 24, 2007), the recipient agrees to use recycled paper and double sided printing for all reports which are prepared as a part of this agreement and delivered to EPA. This requirement does not apply to reports prepared on forms supplied by EPA, or to Standard Forms, which are printed on recycled paper and are available through the General Services Administration.

   The Recipient agrees to follow the requirements set out in Section 6002 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6962). RCRA Section 6002 that preference be given in procurement programs to the purchase of specific products containing recycled materials identified in the guidelines contained in 40 CFR 247.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
# Attachment A: Federal and State Grant Requirements

9. **Indirect Cost:**
   Recipient agrees that if indirect costs are authorized in this award they will be charged at the approved indirect rate for the year in which the funds are actually expended and in accordance with the negotiated indirect cost agreement.

10. **Utilization of Small, Minority and Women's Business Enterprises (MBE/WBE):**
    **GENERAL COMPLIANCE, 40 CFR, Part 33** - The recipient agrees to comply with the requirements of EPA's Program for Utilization of Small, Minority and Women's Business Enterprises in procurement under assistance agreements, contained in 40 CFR, Part 33.

    **MBE/WBE REPORTING, 40 CFR, Part 33, Sections 33.502 and 33.503** - The recipient agrees to complete and submit EPA Form 5700-52A, "MBE/WBE Utilization Under Federal Grants, Cooperative Agreements and Interagency Agreements" beginning with the Federal fiscal year reporting period the recipient receives the award, and continuing until the project is completed. **Only procurements with certified MBE/WBEs are counted toward a recipient's MBE/WBE accomplishments.**

    **The reports are due annually (October 30).** EPA Form 5700-52A may be obtained from the EPA Office of Small Business Program's home page on the Internet at www.epa.gov/osbp.

    **CONTRACT ADMINISTRATION PROVISIONS, 40 CFR, Section 33.302** -The recipient agrees to comply with the contract administration provisions of 40 CFR, Section 33.302.

    **BIDDERS LIST, 40 CFR, Section 33.501(b) and (c)** - Recipients and sub recipients of a Continuing Environmental Program Grant or other annual reporting grant, agree to create and maintain a bidders list. Recipients of an EPA financial assistance agreement to capitalize a revolving loan fund also agree to require entities receiving identified loans to create and maintain a bidders list if the recipient of the loan is subject to, or chooses to follow, competitive bidding requirements. Please see 40 CFR, Section 33.501 (b) and (c) for specific requirements and exemptions.

## B. State Requirements

1. The Subrecipient is required and hereby agrees to use, and require sub-contractors to use, a federal immigration verification system to determine the work eligibility status of new employees physically performing services within the State of Nebraska. A federal immigration verification system means the electronic verification of the work authorization program authorized by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, 8 U.S.C. 1324a, known as the E-Verify Program, or an equivalent federal program designated by the United States Department of Homeland Security or other federal agency authorized to verify the work eligibility status of a newly hired employee.

   If the Subrecipient is an individual or sole proprietorship, the following applies:

   a. The Subrecipient must complete the United States Citizenship Attestation Form attached to this Workplan.

**b.** If the Subrecipient indicates on such attestation form that he or she is a qualified alien, he or she agrees to provide the US Citizenship and Immigration Services documentation required to verify lawful presence in the United States using the Systematic Alien Verification for Entitlements (SAVE) Program.

**c.** The Subrecipient understands and agrees that lawful presence in the United States is required and the Subrecipient will be disqualified or this workplan terminated if such lawful presence cannot be verified as required by Neb. Rev. Stat. §4-108.

**2. Nondiscrimination:**
The Nebraska Fair Employment Practice Act prohibits Subrecipients to the State of Nebraska and their subcontractors from discriminating against any employee, or applicant for employment in the performance of such Intergovernmental Agreements, with respect to hire, tenure, terms, conditions or privileges of employment because of race, color, religion, sex, disability or national origin. The Subrecipient's signature is a guarantee of compliance with the Nebraska Fair Employment Practice Act, and breach of this provision shall be regarded as a material breach of this workplan. The Subrecipient shall insert a similar provision in all subcontracts for services to be covered by any Intergovernmental Agreement resulting from this workplan.

**3. Hold Harmless:**
The Municipality agrees to hold the Nebraska Department of Environmental Quality (NDEQ) harmless for loss or damage sustained by any person as a direct result of the negligent or willful acts by the Municipality, its employees, sub-contractors, or agents in the performance of this agreement including all associated costs of any defending action.

**4. Forfeiture, Repayment and Delays in Disbursement of Funds:**
Violation of any conditions of this workplan by the Subrecipient or failure of the Subrecipient to complete and maintain the project in the manner described, including any amendments thereto which have been properly approved, shall result in the forfeiture of any funds not disbursed. In addition, if for any reason the project is not completed as described, including any amendments thereto that have been or are hereafter approved by the NDEQ, the NDEQ may recover from the Subrecipient any or all funds disbursed.

**5. Remedies Not Exclusive:**
The use by either the Subrecipient or the NDEQ of any remedy specified herein for the enforcement of this Workplan is not exclusive and shall not deprive the party from using such remedy, or limit the application of any other remedy provided by law.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment A: Federal and State Grant Requirements

6. **Assignment:**
No assignment or transfer of this Workplan or any part hereof, rights hereunder, or interest herein by the Subrecipient shall be valid unless and until it is approved by the NDEQ and made subject to such reasonable terms and conditions as the NDEQ may impose.

7. **Waiver of Rights:**
The Subrecipient or NDEQ may from time to time waive any of their rights under this Workplan. However, any waiver of rights with respect to a default of any condition of this Workplan shall not be deemed to be a waiver with respect to any other default.

8. **Applicable Rules and Regulations:**
Both parties shall abide by all applicable rules and regulations of the NDEQ, including any that may be adopted subsequent to the effective date of this Workplan, except those that would invalidate or be inconsistent with the provisions of this Workplan.

9. **Inspection of Books, Records and Reports:**
The duly authorized representative of either party shall have the right to inspect and make copies of any books, records or reports of the other party pertaining to this Workplan or related matters during regular office hours. Each party shall maintain and make available for such inspection accurate records of all its costs, disbursements and receipts with respect to its activities under this Workplan.

10. **Inspection of Premises:**
The duly authorized NDEQ representative shall have the right to inspect the project and related records to assure compliance with the terms of this Workplan during regular office hours.

11. **Independent Subrecipient:**
The Subrecipient is and shall perform this Workplan as an independent Subrecipient and as such shall have and maintain exclusive control over all of its employees, agents and operations. Neither the Subrecipient nor any person employed by the Subrecipient shall act, propose to act or be deemed the NDEQ's agent, representative or employee. The Subrecipient assumes full and exclusive responsibility for the payment of all premiums, contributions, payroll taxes and other taxes now or hereafter required by any law or regulation and agrees to comply with all applicable laws, regulations and orders relating to Social Security, Unemployment Compensation, OSHA, affirmative action, equal employment opportunity and other laws, regulations and orders of like nature. For any work hereunder subject to the Veterans Readjustment Assistance Act of 1974, or the Rehabilitation Act of 1973, the parties hereto shall comply with all provisions thereof, together with all applicable rules, regulations and orders of the Department of Labor, and the notices required pursuant to 41 CFR 60-1.4, 60-250.4 and 60-741.4 which are hereby incorporated by reference into this Workplan.

12. **Amendments:**
This Workplan may be amended in writing at any time by mutual Workplan of the parties, except insofar as any proposed amendments are in any way contrary to applicable law or requirements of the EPA or NDEQ.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment A: Federal and State Grant Requirements

13. **Drug Free Workplace:**
The Subrecipient, by executing this Workplan, certifies and assures that it operates a drug free workplace as addressed in the State of Nebraska Drug Free Workplace Policy of June, 2005.

14. **Publication Rights:**
All parties shall have publication and reproduction rights for all reports and materials, which are produced as a result of this Workplan.

15. **Termination:**
This Workplan may be terminated in whole or in part, in writing, by either party in the event of substantial failure by the other party to fulfill its obligations under this Workplan, through no fault of the terminating party, provided that no termination may be effected unless the other party is given:

   a. Not less than ten (10) calendar days written notice (delivered by certified mail, return receipt requested) of intent to terminate, and

   b. An opportunity for consultation with the terminating party prior to termination.

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
# Attachment B: Annual Report

**NDEQ Contact Information**

Technical Issues: Chris Hetzler (471-0007) chris.hetzler@nebraska.gov or

Jim Yeggy (471-2142) jim.yeggy@nebraska.gov

Budget & Reimbursements: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

Grant Requirements: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

MBE/WBE Submittals: Tracy Zimmerman (471-4272) tracy.zimmerman@nebraska.gov

## PART I. Lincoln/Lancaster County Health Department (LLCHD) §105 Program Commitments

### A. Reports

1. LLCHD shall submit all reports to Tracy Zimmerman (tracy.zimmerman@nebraska.gov), except for reports identified in J.1 and J.2 below which should be submitted to Jim Yeggy (jim.yeggy@nebraska.gov). The required format for submitting the annual report is provided in Attachment B. The reports must be provided via email per the following timelines:

| Report | Due Date | Date Submitted |
|---|---|---|
| Annual (Attachment B for the period of October 1, 2013-September 30, 2014) | Oct 15, 2014 | |
| MBE/WBE Report (http://www.epa.gov/osbp/pdfs/5700_52a.pdf) | Oct 15, 2014 | |
| Annual (Attachment B for the period of October 1, 2014-September 30, 2015) | Oct 15, 2015 | |
| MBE/WBE Report (http://www.epa.gov/osbp/pdfs/5700_52a.pdf) | Oct 15, 2015 | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

**B. Planning and SIP Management Activities: LLCHD Program Regulations and Standards Modifications**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall, as necessary, propose revisions to the *'Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards'* (LLCAPCPRS) to address environmental priorities and to incorporate Federal Regulations promulgated pursuant to the 1990 CAA Amendments. | As necessary. | **Summarize SIP Activities for FY 2014** |
| 2. LLCHD shall utilize all applicable local regulations & departmental policies concerning public processes associated with regulation development and proposals. LLCHD shall supply the following as applicable:<br>a. Submit a copy of the public notice process utilized by LLCHD for regulation changes and permitting to the NDEQ.<br>b. Provide a copy of all meeting notices related to regulation or policy change to the NDEQ.<br>c. If LLCHD is intending to provide testimony on Title 129 or SIP modifications, draft copies or summary information concerning the planned testimony must be provided to the NDEQ at least one week prior to the EQC hearing, legislative hearing, etc. This commitment does not preclude the LLCHD from amending planned testimony. If amendments are made to the planned testimony, LLCHD will immediately notify the NDEQ of the amendments. | a. By December 31, 2014. Future revisions to the process must be submitted within 30 days of revision.<br>b. At the time of public issuance.<br>c. As applicable. | **Summarize SIP Activities for FY 2015** |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. New regulatory requirements that have been incorporated into Title 129 must be promulgated into the LLCAPCPRS. Proposed LLCAPCPRS revisions that are awaiting administrative approvals are acceptable with written notification to NDEQ. | Within 12 months of incorporation into Title 129. | |
| 4. LLCHD shall identify sources impacted by regulatory changes and disseminate information as appropriate in regard to promulgation of new regulations. | As applicable. | |

| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. NDEQ shall notify LLCHD and request input during the initial stages of the development of proposed revisions to Title 129. | As applicable. | |
| 2. NDEQ shall provide formal notification to LLCHD when draft revisions to Title 129 are available, provide a copy of all proposed revisions to LLCHD indicating the proposed changes, and shall request comment. | Upon development of the draft proposals. | |
| 3. NDEQ shall directly notify LLCHD by e-mail or other appropriate means when proposed changes to Title 129 have been finalized. | Within 30 days of approval by the Governor. | |

**C. Planning and SIP Management Activities: State Implementation Plan (SIP) Modifications**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD must evaluate all proposed LLCAPCPRS rule/regulation changes to ensure that they are consistent with the Nebraska SIP. | Prior to placing the proposed rule/regulation changes on public notice. | |
| 2. All necessary documentation of rule/regulation changes to be incorporated into the Nebraska SIP must be provided to the NDEQ. | No later than 30 days after adoption. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. LLCHD will review and, when appropriate, prepare comments on proposed State and Federal Regulations and policies that may impact the LLCHD Air Quality Program. | As applicable. | |

| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. NDEQ shall submit all revised LLCAPCPRS regulations to the EPA for inclusion in the Nebraska SIP. | Within 6 months of receipt of the final approved revisions from LLCHD. | |

**D. Emission Inventory**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD will develop and submit to EPA an emission inventory, including all necessary data elements, as prescribed by the Air Emission Reporting Rule (AERR). | By December 31 of each year. | Date 2012 EI submitted:<br><br>Date 2013 EI submitted: |
| 2. The LLCHD will continue to compile a toxic emissions inventory for point sources. HAP inventories must be consolidated with Criteria inventories and submitted to the EPA as outlined in AERR. | As applicable. | |
| 3. If EPA generated toxic inventory estimates for mobile, biogenic and area sources are utilized, LLCHD will review the estimates for relative accuracy. | As applicable. | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 4. The LLCHD will annually conduct emission inventory audits at a minimum of 10% of Class II sources. | By December 31 of each year. | **2012 Emission Inventory**<br>On-site Audits:<br>Facilities Submitting Inventories:<br>Class I:<br>Class II:<br>No Operating Permit Required:<br>Low Emitter:<br><br>**2013 Emission Inventory**<br>On-site Audits:<br>Facilities Submitting Inventories:<br>Class I:<br>Class II:<br>No Operating Permit Required:<br>Low Emitter: |
| 5. If errors occur during the submission of data to the National Emissions Inventory Database, LLCHD will make corrections to their data submittal and resubmit changes by the deadlines established in the AERR. | By necessary timeframes provided by the EPA or NDEQ. | |
| 6. The LLCHD will follow the procedures specified in their Quality Assurance Project Plan (QAPP) to identify and correct suspect data. | As applicable. | |
| 7. The LLCHD shall submit a copy of their approved Quality Assurance Project Plan for its Emission Inventory activities to Tracy Zimmerman. | By December 31 of each year. | Date QAPP submitted: |
| 8. The LLCHD will annually supply NDEQ with an electronic copy of all emission inventories gathered for the previous year or provide NDEQ access to the LLCHD emission inventory database. | The previous year's emission inventory data will be supplied by May 1 of each year. | Date submitted: |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

### E. Hazardous Air Pollutant Program

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD will send a copy to NDEQ of any final 112(g) determinations. | Within 60 days of permit issuance. | |
| 2. LLCHD will send to NDEQ copies of Initial Notification and Compliance Certification for MACT sources it receives. If it is unclear whether the Initial Notification or Compliance Certification was sent to the EPA, LLCHD will forward a copy to EPA Region 7. | Within 30 days of receipt. | |
| 3. LLCHD will provide NDEQ, as part of the annual report, a compilation of all sources identified as subject to NESHAPs as well as negative declarations. | Complete Hazardous Air Pollutant section of Attachment B and submit with annual report. | |

### F. Compliance and Enforcement Activities

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. For inspections at Air Emission Sources (except the Asbestos NESHAPs Program):<br>a. LLCHD will implement EPA's Compliance Monitoring Strategy dated April 2001.<br>b. LLCHD will follow the Policy on Timely & Appropriate Enforcement to High Priority Violations (T&A, dated 12/22/98). | | **Inspections FY 2014** (regulatory activities only; does not include asbestos or complaint inspections):<br><br>**Inspections FY 2015** (regulatory activities only; does not include asbestos or complaint inspections): |
| 2. LLCHD will continue to respond to asbestos-related complaints and inquiries as well as alleged asbestos-related violations. LLCHD will maintain records of asbestos-related complaints received, resolution of complaints, and asbestos inspections conducted. | | **Asbestos FY 2014**<br>Complaints:<br>Inspections:<br><br>**Asbestos FY 2015**<br>Complaints:<br>Inspections: |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. Compliance Reports: LLCHD will review all reports submitted by non-Title V sources in fulfillment of permit requirements to determine compliance with the applicable requirements. | Within the calendar year that they are received. | |
| 4. Enforcement:<br>a. LLCHD will issue Notices of Violation promptly upon discovery of violations. The notice of violation will contain an order to correct the deficiency. Sources will be required to return to compliance within 60 days of receipt of the letter unless circumstances require a longer compliance schedule to be approved by LLCHD.<br>b. In general, NDEQ and LLCHD will assume the enforcement lead for violations identified by their respective programs. However, there may be instances where it would be more appropriate for either NDEQ or LLCHD to take the lead for a violation cited by the other agency. These cases will be discussed to determine any impediments to enforcement, and which agency is best suited to address the violations.<br>c. Violations that are identified as High Priority Violations will be addressed by LLCHD by following the Policy on Timely and Appropriate Enforcement to High Priority Violations (T&A) dated December 22, 1998 and in accordance with the current Performance Partnership Agreement.<br>d. LLCHD will promote Pollution Prevention | | **Enforcement Activity for FY 2014**<br>Notices of Violations Issued:<br>Cases pending at Beginning of Period:<br>New Cases Opened:<br>Cases Closed or Resolved:<br>Cases Pending at end of Reporting Period:<br>Letters of Warning Issued:<br>Complaints (regulatory activities only):<br>Complaints referred to other programs:<br>Complaints resulting in onsite inspections:<br>Complaints Resolved (regulatory activities only):<br>Stack Tests Scheduled:<br>Stack Tests Observed:<br>Continuous Emission Monitoring onsite observations conducted :<br>Continuous Emission Monitoring Audits Reviewed:<br><br>**Enforcement Activity for FY 2015**<br>Notices of Violations Issued:<br>Cases pending at Beginning of Period:<br>New Cases Opened:<br>Cases Closed or Resolved:<br>Cases Pending at end of Reporting Period:<br>Letters of Warning Issued:<br>Complaints (regulatory activities only):<br>Complaints referred to other programs:<br>Complaints resulting in onsite inspections:<br>Complaints Resolved (regulatory activities only): |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
## Attachment B: Annual Report

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| and Supplemental Environmental Projects in Enforcement Settlements when appropriate.<br>e. When requested by the NDEQ, LLCHD will share compliance related information in order to support enforcement cases being pursued by the NDEQ.<br>f. LLCHD shall observe a minimum of 2 stack tests and/or Relative Accuracy Testing Audits (RATAs) annually.<br>g. LLCHD shall perform a minimum of 4 reviews of stack test and/or RATA results. | | Stack Tests Scheduled:<br>Stack Tests Observed:<br>Number of field reviews conducted (RATA's seen):<br>RATA Desk Audits:<br>Number of RATA tests reports reviewed:<br>Continuous Emission Monitoring onsite observations conducted :<br>Continuous Emission Monitoring Audits Reviewed: |
| 5. Open Burning: LLCHD will review open burning requests for potential sites located in Lancaster County. Burning permits will be issued or denied in accordance with approved LLCHD regulations. | | **Open Burning FY 2014**<br>Issued:<br>Denied:<br>**Open Burning FY 2015**<br>Issued:<br>Denied: |
| 6. Acid Rain:<br>a. LLCHD will work with NDEQ to implement acid rain activities and report information to NDEQ.<br>b. LLCHD will review all acid rain permits in Lancaster County and permit modifications. | | **Acid Rain Activity FY 2014**<br>Number of acid rain permits and/or modifications received:<br>Number of acid rain permits and/or modifications reviewed:<br>**Acid Rain Activity FY 2015**<br>Number of acid rain permits and/or modifications received:<br>Number of acid rain permits and/or modifications reviewed: |
| 7. LLCHD staff will provide data which results in a source's re-classification to the data manager as soon as practicable. | | |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 8. LLCHD will notify NDEQ of penalty amounts as a result from enforcement actions within 30 days to the date the fine is levied. | | |
| 9. LLCHD inspection reports will document the status of all applicable requirements, including any NESHAP requirements. | | |
| 10. LLCHD will include all enforcement documentation, including penalty calculations, in the source file and according to LLCHD's confidentiality procedures. | | |
| 11. LLCHD will include all inspection cover letters and a signed copy of the report in each source file. | | |
| 12. LLCHD will review each excess emission and coal analysis report received. LLCHD will notify NDEQ within 30 days if any report exceeds 5% excess emissions or 5% monitor downtime based on the emission unit's operational time. | | **Excess emission and coal analysis reports FY 2014**<br>Number of reports that exceed 5% excess emissions based on the emission unit's operational time:<br><br>Number of reports that exceed 5% monitor downtime based on the emission unit's operational time:<br><br>**Excess emission and coal analysis reports FY 2015**<br>Number of reports that exceed 5% excess emissions based on the emission unit's operational time:<br><br>Number of reports that exceed 5% monitor downtime based on the emission unit's operational time: |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 13. On-Site and Phone Technical and Compliance Assistance: LLCHD Air Program staff will provide compliance and technical assistance on air quality regulations to non-Title V sources as requested. | | Number of Sources Reached with Compliance Assistance FY 2014:<br><br>Number of Sources Reached with Compliance Assistance FY 2015: |

| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. NDEQ will provide LLCHD with at least a 14 day advance notice of any Lancaster County air source inspection activity to be conducted by NDEQ for the purpose of monitoring compliance with regulations which LLCHD has adopted. The LLCHD will be provided an opportunity to participate in these inspections. The EPA or NDEQ may participate in LLCHD led inspections. | | |
| 2. When NDEQ is notified that EPA is conducting compliance activity in Lancaster County that is not related to compliance with local regulations (e.g. CFC and mobile source inspections), NDEQ will provide the LLCHD with advance notice of said activities to the extent possible. | | |
| 3. NDEQ shall send to LLCHD copies of all reports received related to EPA inspections conducted in Lancaster County if it is apparent that the reports were not received by LLCHD. If business confidentiality is claimed by the source, the inspection report may not be fully available for review. | Upon receipt by the NDEQ. | |

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### G. Construction Permit Activities

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall review permit applications for new and modified non-PSD sources of air pollutants and issue permits in accordance with the approved Nebraska SIP. Permit conditions and limitations shall be written in a federally enforceable manner. All public notices will be provided to the NDEQ at the time of issuance. Copies of applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request. | | **Annual estimates for Construction Permits FY 2014**<br>Pending/Extended Beginning Total (ending total of the previous report):<br><br>Applications/Modifications Received this reporting period:<br><br>Action Taken this reporting period(completed, issued, denied, or no permit necessary):<br><br>Ending Total (pending/extended end of report):<br><br>State Action within 90 days:<br>PSD Permits within 90 days:<br>State Toxics BACT decisions:<br>PSD BACT decisions:<br>112(g) decisions:<br>Variances Issued:<br><br>**Annual estimates for Construction Permits FY 2015**<br>Pending/Extended Beginning Total (ending total of the previous report):<br><br>Applications/Modifications Received this reporting period:<br><br>Action Taken this reporting period(completed, issued, denied, or no permit necessary):<br><br>Ending Total (pending/extended end of report):<br><br>State Action within 90 days:<br>PSD Permits within 90 days:<br>State Toxics BACT decisions:<br>PSD BACT decisions:<br>112(g) decisions:<br>Variances Issued: |

# FFY 2014-2015 Work Plan for LLCHD: Section 105 Air Quality Program
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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 2. LLCHD will submit to NDEQ construction permit information concerning a project description, the type of permit (e.g. PSD, Part D, synthetic minor, as built, NSPS & NESHAPs), and the permit reviewer upon request. | | |
| 3. LLCHD will provide a response to any NDEQ and/or EPA comments on proposed permits received during the 30-day public comment period. | | |
| 4. To facilitate permit review, the LLCHD will make all facility files available at their respective offices for EPA/NDEQ review. | | |
| 5. LLCHD will notify NDEQ prior to issuing a variance or waiver from air pollution rules or regulations. | Prior to issuance of the variance or waiver. | |
| 6. LLCHD will send a copy of PSD permit applications and supplemental information to NDEQ and EPA. | Within two weeks after receipt of such information. | |
| 7. LLCHD will send a copy of each PSD public notice package to NDEQ and EPA The package will include a copy of the draft permit, a fact sheet, and the public notice. | By the start of the public comment period. | |
| 8. LLCHD will send a copy of each final PSD permit package to NDEQ and EPA. The final package will include a copy of the final permit decision, response summaries, and any other supporting materials. | Within two weeks of finalization of the permit package. | |
| 9. LLCHD shall submit Best Available Control Technology/Lowest Achievable Emission Rate (BACT/LAER) decisions to EPA's national clearinghouse. | Within 30 days of permit issuance. | |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 10. LLCHD will review and comment on submitted dispersion modeling in accordance with the Nebraska SIP and other state and EPA regulations. | Within 30 days of receipt. | |
| 11. For draft PSD permits reviewed by NDEQ and/or EPA and for which confidential information has been received by the LLCHD, the LLCHD will notify the source of its obligation to provide copies of such information to the NDEQ and/or EPA in order for the NDEQ and/or EPA to complete its review. | | |
| 12. Where appropriate and as resources allow, LLCHD will conduct a screening analysis for toxics when issuing construction permits and make that information available to the public. | | |
| 13. LLCHD will ensure that a statement of basis is always prepared for all construction permits. LLCHD will fully explain the provisions of each permit and reasons for omitting any other provisions that might appear to be applicable to the source or process. | | |

| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. NDEQ will notify the LLCHD of any concerns with proposed permits within the 30-day public notice period. | | |

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### H. Operating Permits

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall review permit applications and develop and issue non-Title V Class II operating permits. Permit conditions and limitations shall be written in a federally enforceable manner. Copies of public notices, applications, draft permits, fact sheets and statements of basis will be provided to NDEQ or EPA upon request. | As needed. | **Annual estimates for Operating Permits FY 2014**<br>Pending/Extended Beginning Total (ending total of the previous report):<br><br>Applications/Modifications Received this reporting period:<br><br>Action Taken this reporting period (completed, issued, denied, or no permit necessary):<br><br>Ending Total (pending/extended end of report):<br><br>**Annual estimates for Operating Permits FY 2015**<br>Pending/Extended Beginning Total (ending total of the previous report):<br><br>Applications/Modifications Received this reporting period:<br><br>Action Taken this reporting period (completed, issued, denied, or no permit necessary):<br><br>Ending Total (pending/extended end of report): |
| 2. To facilitate permit review, the LLCHD will make files available at their office for NDEQ/EPA review. | As needed. | |
| 3. LLCHD will issue warning letters or will take enforcement action when sources do not comply with Part 70 application requirements regarding renewal applications being submitted less than six months prior to the expiration of the permit. | | |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 4. LLCHD will ensure that all pre-construction permit changes will be public noticed and any conditions noted in an operating permit will be consistent with those in the applicable construction permit(s). | | |
| 5. LLCHD will ensure that a statement of basis is always prepared for all operating permits. LLCHD will fully explain the provisions of each permit and reasons for omitting any other provisions that might appear to be applicable to the source or process. | | |
| 6. All applicable requirements outlined in the permit will be accompanied by the citation of the appropriate, underlying Federal, State, or Local regulatory authority. | | |

**I. Ambient Monitoring: Network Operations**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall operate the ambient network described in *Attachment A: LLCHD § 105 Air Monitoring Network Summary Description*. Changes to the network may be made due to shifting monitoring priorities and/or monetary constraints. Prior NDEQ approval is required for such changes. Unplanned site losses may also result in network modifications. See subsections below for more information relative to network modification requirements. | | |
| 2. The ambient network shall be operated so as to comply with the requirements set forth in 40 CFR Part 58. | | |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. The ambient network shall be operated in accordance with applicable Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures (SOPs) (Also see Subsection L below). | | |
| 4. The ambient network shall be operated so as to achieve at least 75% complete data from each monitor in each calendar quarter. | | |
| 5. LLCHD shall provide prior written requests to NDEQ for network changes that include basis documentation, and/or requests for technical support to provide basis documentation. | | |
| 6. In the event of unplanned loss of a site (e.g., storm damage, building eviction), oral notice shall be promptly provided to the NDEQ, with a follow-up written notice (mail or email). The written notice shall include a plan for re-locating or discontinuing the site, including basis documentation and/or a technical support request. | Within 30 days of the unplanned loss of the site. | |
| 7. LLCHD will review sites to ensure they comply with the siting criteria set forth in 40 CFR Part 58, Appendix E (8) using the site review checklist provided by the NDEQ. Retain checklist as documentation of site reviews for at least 3 years. | | |

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### J. Annual Network Reviews

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall complete a review of the ambient network to ensure that it meets the monitoring objectives defined in 40 CFR Part 58, Appendix D and to examine network effectiveness. Network reviews will consider the following:<br>a. Modifications needed to implement changing Federal and state priorities, such as those associated with the Regional Air Monitoring Strategy and Phase I of Ncore Level II;<br>b. Data reviews with respect to NAAQS compliance and inter-site correlations; and<br>c. Any new or revised modeling results that may be available. | Annually by May 1. | Complete Ambient Monitoring Report in Attachment B. |
| 2. LLCHD shall submit a written network review report. This report shall include:<br>a. A description of any network changes in the previous and current calendar year;<br>b. Any network change recommendations for the remainder of the calendar year and their basis; and<br>c. Any technical review and/or support needs (e.g., modeling assistance) anticipated for the next year. | Annually by May 15. | |
| 3. LLCHD shall relocate the Lincoln MSA ozone monitor in FFY2015. Alternatively LLCHD may operate SPM or temporary investigative monitoring sites as part of the new site selection process. | By December 31, 2015. | |

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### K. Ambient Monitoring AQS Data Submittal

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. Data Submittal: LLCHD shall submit all ambient air quality data to AQS. The data submitted shall include raw data as well as accuracy, precision, and bias data. The data shall be coded into the AIRS-AQS format and submitted via electronic transmission. Data submitted to AQS shall be edited and validated prior to submission. Operational data shall be reported in accordance with 40 CFR Part 50, Appendix L. | Within 90 days of the close of the following calendar quarters:<br>• January 1 - March 31<br>• April 1 - June 30<br>• July 1 - September 30; and<br>• October 1 - December 31 | |
| 2. Data Review: LLCHD shall retrieve AQS data using the AMP 450 report format to verify that data submittal is complete, and to review NAAQS compliance. | Following the quarterly submittal of monitoring data. | |

### L. Ambient Monitoring: Quality Assurance

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall maintain and follow Quality Assurance Project Plans (QAPPs) and Standard Operating Procedures (SOPs) that comply with the Federal requirements set forth 40 CFR Part 58 and EPA QA/R-5 (*EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations*). LLCHD shall either follow QAPP and SOP procedures developed by the NDEQ, or develop and follow their own QAPPs and/or SOPs. | | |
| 2. NDEQ and LLCHD will coordinate in the review and possible updates of QAPPS and SOPs pertinent to this work plan. | | |

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. If LLCHD utilizes its own QAPP and /or SOPs, the following requirements apply:<br>a. QAPP and SOPs must comply with all EPA requirements (i.e., 40 CFR Part 58 & EPA QA/R-5);<br>b. LLCHD SOP developed under the NDEQ QAPP must be consistent with NDEQ's QAPP;<br>c. QAPP and SOPs, and modifications must be submitted to NDEQ for review and approval;<br>d. LLCHD shall address any NDEQ comments or change requests that apply to QAPPS and SOPs; and<br>e. QAPPs must be reviewed annually in accordance with the requirements set forth in EPA QA/R-5. | | |
| 4. The standards used in the checks and audits must be certified and their certifications kept current. | | |

**M. Audit Participation**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD shall participate in audits conducted by EPA, NDEQ, or contractors representing these agencies. | As requested. | |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 2. LLCHD shall address and correct any deficiencies recognized in said audits. In the event an audit finds deficiencies or requests corrective actions, LLCHD shall submit a response to NDEQ and/or EPA as appropriate. Said response shall describe corrective actions to be taken and a timetable for completing them. | Within 45 days of receipt of the final audit report. | |

| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. For audits of LLCHD conducted by the NDEQ, the final audit report shall be submitted to LLCHD. | Within 60 days of completion of the audit. | |

**N. Ambient Monitoring: Equipment Purchases**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. When requested by NDEQ, provide a list of equipment needed for purchase. A one-year planning period is typically requested, and information needs include: equipment description, approximate cost and funding source(s). | By January 1 each year. | |
| 2. Maintain a list of all equipment purchases made in the current Federal fiscal year and supply the list with the work plan annual report. The list must include the following information: equipment description, month of purchase, cost and funding sources. | | |

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**O. Inter-Agency Communications**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. Decision-Making / Technical Support: Any request for decision-making or technical support shall be made in writing, with support documentation provided as needed or requested. | | |
| 2. LLCHD agrees to consult with NDEQ on consistency/uniformity/communication matters relating to construction/Non-Title V operating permits and violations before consulting with the EPA. | | |
| 3. LLCHD will participate in state/EPA teleconferences or meetings regarding the air quality program. | As requested or appropriate. | |
| 4. EPA - LLCHD Interactions: LLCHD shall:<br>a. Inform NDEQ of any meetings with EPA; and<br>b. Provide NDEQ with copies of EPA correspondence that is not addressed to and/or not received by NDEQ. | | |
| 5. Information Requests: LLCHD shall provide information relative to activities carried-out using §105 grant funding. | As requested by the NDEQ. | |
| 6. On-Site and Phone Technical and Compliance Assistance: LLCHD will provide compliance and technical assistance on air quality regulations to non-Title V sources. | | |

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| NDEQ Commitments | Time Table | |
|---|---|---|
| 1. NDEQ commits to providing LLCHD timely information on issues that come to its attention which relate to air quality work, e.g. correspondence, notifications, guidance, etc. which may be addressed only to State agencies from EPA. | | |

**P. Electronic Communications**

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD will provide compliance summary information as notices are issued to sources. LLCHD will provide notification about PSD permits as issued. Permitting summary information will be provided to the NDEQ relative to stationary sources annually. | Compliance notices and PSD permits as issued. Permitting summary information with the annual report. | |
| 2. Stationary source activities will be entered into AIRS Facility Subsystem (AFS). The information will include the minimum mandatory data elements required nationwide. | Information will be entered by the 8th of each month. | |
| 3. LLCHD agrees to cooperative with the NDEQ and EPA to address any data transfer problems that may be recognized. | As applicable. | |
| 4. Data that is electronically transmitted by LLCHD will only be changed by LLCHD, from the original submittal, unless otherwise agreed to by LLCHD. | | |
| 5. LLCHD commits to working with the NDEQ to facilitate electronic access to LLCHD data as needed. | | |

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### Q. Training

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. All personnel responsible for data collection/reviews shall complete training consistent with their responsibilities (for Ambient Monitoring QA requirements see L.1). As resources allow, LLCHD will encourage additional training and education for its employees in the program as needed and appropriate. | | |
| 2. As resources allow, the LLCHD will participate in EPA data management work groups, and national and regional AIRS conferences charged with identifying the system enhancements necessary to improve data management. | | |
| 3. LLCHD shall maintain and report using the template below a list of training for all staff members for the most recent 1 year period. The training list must include: Name/Description of Training, Number of Attendees, Date(s) and Location. | | |

### R. Public Education and Outreach

| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 1. LLCHD will continue to educate the public regarding air quality data and issues under Lincoln Lancaster County Health Department Air Quality's jurisdiction. | Training shall be reported by October 15 of each year. | **FY 2014**<br>Meetings Conducted/Meeting Presentations<br><br>**FY 2015**<br>Meetings Conducted/Meeting Presentations |
| 2. LLCHD will participate in educational events sponsored by EPA when appropriate and when resources allow. | | |

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| LLCHD Commitments | Time Table | Outputs/Outcomes |
|---|---|---|
| 3. LLCHD will encourage industry to seek voluntary reductions in air toxics when the opportunities occur. | | |

**S. Employee Training Conducted This Period**

| Type of Training | Date | Location | Hours | # Attendees |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

**T. Report any significant activity that deserves attention or recognition**

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## Hazardous Air Pollutants

| Source | Updated Estimates | |
|---|---|---|
| | Sources Identified | Negative Declarations |
| Dry Cleaning (Subpart M) | | |
| Chromium Electroplating (Subpart N) | | |
| Ethylene Oxide Emissions for Sterilization (Subpart O) | | |
| Paint Stripping and Misc., Surface Coating (Subpart 6H) | | |
| Hospital Ethylene Oxide Sterilizers (Subpart wwwww) | | |
| Halogenated Solvents (Subpart T) | | |
| Gasoline Distribution (Subpart R) | | |
| Aerospace (Subpart GG) | | |
| Wood Furniture (Subpart JJ) | | |
| Printing & Publishing (Subpart KK) | | |
| Hazardous Waste Combustors (Subpart EEE) | | |
| Pharmaceutical Production (Subpart GGG) | | |
| Natural Gas Extraction and Storage (Subpart HHH) | | |
| Portland Cement (Subpart LLL) | | |
| Secondary Aluminum (Subpart RRR) | | |
| Publicly Owned Treatment Works ( Subpart VVV) | | |
| Municipal Solid Waste Landfills (Subpart AAAA) | | |
| Organic Liquids Distribution (non-gasoline) (Subpart EEEE) | | |
| Miscellaneous Organic Chemical Production (Subpart FFFF) | | |
| Solvent Extraction for Vegetable Oil (Subpart GGGG) | | |
| Surface Coating of Automobiles & Light-Duty Trucks (Subpart IIII) | | |
| Paper & Other Web Coating (Subpart JJJJ) | | |

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| Source | Updated Estimates | |
|---|---|---|
| | Sources Identified | Negative Declarations |
| Miscellaneous Metal Parts Surface Coating (Subpart MMMM) | | |
| Fabric Printing, Coating & Dyeing (Subpart OOOO) | | |
| Plastic Parts & Products Surface Coating (Subpart PPPP) | | |
| Metal Coil Coating (Subpart SSSS) | | |
| Boat Manufacturing (Subpart VVVV) | | |
| Reinforced Plastic Composites (Subpart WWWW) | | |
| Combustion Turbines (Subpart YYYY) | | |
| Reciprocating Internal Combustion Engines (Subpart ZZZZ) | | |
| Site Remediation (Subpart GGGGG) | | |
| Paint Stripping and Miscellaneous Surface Coating – Area Sources (Subpart HHHHHH) | | |
| Chemical Manufacturing (area sources) (Subpart VVVVVV) | | |
| Prepared Feeds Manufacturing (Subpart DDDDDDD) | | |
| Gasoline Bulk Terminals (Subpart BBBBBB) | | |
| Gasoline Dispensing (Subpart CCCCCC) | | |
| Iron & Steel Foundries (area sources) (Subpart ZZZZZ) | | |
| Wood Preserving Sources (Subpart QQQQQQ) | | |
| Plating & Polishing (Subpart WWWWWW) | | |
| Metal Fabrication & Finishing (Subpart XXXXXX) | | |
| Boilers – Area Sources (JJJJJJ) | | |
| Wood Products Surface Coating – Subpart QQQQ | | |
| Paints and allied Products – Area Sources (Subpart CCCCCCC) | | |
| **TOTALS** | | |

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## Ambient Monitoring

| Ambient Monitoring | Annual Estimate |
|---|---|
| Include list of all monitors providing under 75% complete data, their % complete data, an explanation of the problem(s) encountered and corrective actions taken. | |
| List any network changes requested and approximate date of requests made in the current Federal fiscal year. | |
| List sites and date of closure of any sites subject to unplanned closures within the current Federal fiscal year. | |
| Report completed quarters over the last year. | |
| Explain any incomplete or late submittals. | |
| Were there any NAAQS violations or levels that indicate a pending NAAQS violation? If so, explain. | |
| List all QAPPS and SOPS developed by LLCHD<br>Copy of QAPP submitted to NDEQ for review? If, no provide explanation and timeline for submittal. | |